

## REMARKS

Claim 1 is amended to include the limitations of claims 2 and 3; claim 8 is amended to include limitations similar to those of claims 2 and 3; claim 9 is amended to include the limitations of claims 10 and 11; claim 16 is amended to include the limitations of claim 17; and claims 2, 3, 7, 10, 11, 15, and 17 are canceled without prejudice.

Claims 1, 4-6, 8-9, 12-14, 16, and 18-20 remain pending. Reconsideration and allowance of the application are respectfully requested.

The Office Action does not show that claims 1 – 15 are unpatentable under 35 USC §103(a) over “Beadle” (U.S. Patent No. 6,637,025 to Beadle et al.), in view of “Gerard” (U.S. Patent No. 5,974,428 to Gerard et al.). The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references and fails to provide a proper motivation for modifying the teachings of Beadle with teachings of Gerard.

As to claim 1, which now includes the limitations of canceled claims 2 and 3, the limitations include establishing a mapping of original method names of the first set to corresponding substitute method names of methods in a second set, wherein the methods in the second set change the functionality of the methods in the first set; and in response to loading a class file of a class in the first set, replacing in the class file original methods names with corresponding substitute method names. These limitations are not shown to be suggested by the cited teachings of Beadle.

In alleging that these limitations are taught by Beadle, the Office Action cites the same teachings as are used in alleging that Beadle teaches the mapping of class names and replacing of class names in a class name file. It is respectfully submitted, however, that none of the cited teachings in any apparent manner suggest mapping of method names and replacement of method names in the class file. It is not even apparent that Beadle teaches replacing of class names in the class file.

The cited teaching of Beadle (col. 5:64 - 6:35) discusses loading of a class and methods for compiling the class. There is no apparent suggestion of any changing of

method names or class names in the class file. If the rejection is maintained, further explanation is requested as to how the specific teachings of Beadle are construed to suggest changing names in the class file. Otherwise the rejection should be withdrawn.

Claim 1 as amended also includes the limitations of caching in a class cache on the computing system the class file having the substitute class names and substitute method names. The Office Action cites Beadle's example data processing system that includes a cache memory for a processor. Those skilled in the art will recognize, however, that a cache memory for a processor does not suggest a class cache because processor caches are typically address based and are not based on classes of an object oriented program. Thus, the limitations pertaining to caching are not shown to be suggested by Beadle.

The alleged motivation for incorporating the teachings of Gerard into Beadle are conclusory and improper. The alleged motivation states that "it would have been obvious to incorporate the teaching of Gerard into the teaching of Beadle to map substituted class name ... because one of ordinary skill in the art would have been motivated to program a loader to map old class names to new class names or to substitute one class name for another class name." This alleged motivation repeats the claim limitations as the motivation to combine the teachings. There is no evidence presented to indicate that Beadle has any need for such mapping, and the alleged motivation is based on hindsight and therefore improper.

Claim 4 includes limitations of replacing the original class names with the substitute class names in a constant pool within the class file, and changing in the class file method invocation bytecodes from references to original methods to references to substitute methods. The Office Action cites Beadle's teachings at col. 6:14-17 as suggesting these limitations. However, there is no apparent element in this section that can reasonably be understood to correspond to the constant pool. If the rejection is maintained, further explanation is requested as to the specific element of Beadle that is understood to correspond to the constant pool. Otherwise the rejection should be withdrawn.

Claims 5 and 6 depend from claim 4 and are not shown to be unpatentable for at least the reasons set forth above.

Claims 8-9 and 12-14 are similarly not shown to be unpatentable for at least the reasons set forth above.

The rejection of claims 1, 4-6, 8-9, 12-14 over the Beadle-Gerard combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination and fails to provide a proper motivation for combining the references.

The Office Action fails to establish that claims 16 – 20 are unpatentable under 35 USC §103(a) over “Fresko” (U.S. Patent No. 5,966,702 to Fresko et al.) in view of Gerard. The rejection is respectfully traversed because the Office Action fails to show that all the limitations are suggested by the references.

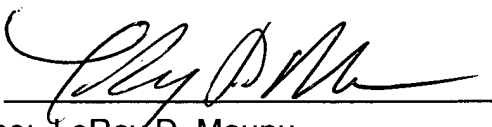
Claim 16 is amended to include the limitations of canceled claim 17. These limitations include caching the class file in a class cache on the client system after the replacing step. The Office Action cites Gerard’s computer system cache memory as corresponding to these limitations. However, as explained above in regards to Beadle’s cache, the caches described by both Beadle and Gerard are more likely than not addressable memory based. This type of cache is not suggestive of the claimed class cache. Therefore, the limitations of claim 16 are not shown to be suggested by the Fresko-Gerard combination.

The rejection of claims 16, and 18-20 over the Fresko-Gerard combination should be withdrawn because the Office Action fails to show all the limitations are suggested by the combination.

Withdrawal of the rejections and reconsideration of the claims are respectfully requested in view of the remarks set forth above. No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (HPCO.074PA).

Respectfully submitted,

CRAWFORD MAUNU PLLC  
1270 Northland Drive, Suite 390  
Saint Paul, MN 55120  
(651) 686-6633

By:   
Name: LeRoy D. Maunu  
Reg. No.: 35,274